

EXHIBIT "A"

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants.

No. 2:18-cv-01107

ORDER

AND NOW TO WIT, on this day of October, 2018, upon consideration of the Plaintiff's Motion for Sanctions/Motion to Compel along with any response thereto from the Defendants', it is hereby ORDERED that the Plaintiff's Motion is hereby GRANTED.

Defendants are hereby ORDERED to pay Plaintiff's counsel \$ in legal fees for sanctions for failing to provide discovery.

Defendants are further ordered to provide Plaintiff with full and complete discovery within five (5) days of this Order or suffer additional sanctions.

J.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants.

No. 2:18-cv-01107

**MOTION FOR SANCTIONS/MOTION TO COMPEL
FOR FAILURE TO COMPLY WITH JUDGE'S COURT ORDER**

1. On or about March 15, 2018, Plaintiff filed a civil complaint for a 1983 action/wrongful death against the above-captioned defendants.
2. After having been served with said complaint the City failed to provide the Plaintiff with any discovery.
3. On or about May 29, 2018, this honorable court, by and through Judge Goldberg, did issue a court order stipulating that the defendants must provide discovery to the Plaintiff.
4. The parties have been ordered to attend a mandatory settlement conference before the Honorable Judge Strawbridge for the above-captioned civil case.
5. Defendant, initially, violated said order and Plaintiff, as a result, did file a motion to compel said discovery.
6. As a result of a hearing on said motion, Judge Goldberg did, admonish the Defendants' for their dilatory behavior, as it relates to providing the Plaintiff with timely discovery, and did grant Plaintiff's first motion to compel and ordered the Defendants to deliver said initial discovery.

7. Defendants, did, finally, comply with said order and did provide some initial, though incomplete, discovery to the Plaintiff.

8. Upon finally receiving initial discovery from the Defendants said initial discovery indicated that a defendant witness/supervisor/deputy warden did, knowingly, place decedent Plaintiff into solitary confinement despite the fact that she knew full well that Plaintiff, decedent, wanted to harm himself or others.

9. Since this is a major component of the Plaintiff's case, as a result therefrom and after reviewing said initial discovery, Plaintiff did send the Defendants, on or about, August 23, 2018 follow up interrogatories and Requests for Production of Documents and did renew her request for all discovery, including but not limited to, all Monell material.

10. The parties were ordered to appear at an initial Settlement Conference before the Honorable Magistrate Judge Strawbridge on August 14, 2018.

11. Prior to said first Settlement Conference hearing and thereafter the Plaintiff renewed her request that Defendants comply with said supplemental/additional discovery requests forthwith.

12. On or about August 14, 2018, during said initial settlement conference the Defendants' counsel did readily admit to both Judge Strawbridge and to Plaintiff's counsel that he was, then, in possession of fully complete "Monell" discovery related to this particular case and further stated to both Plaintiff's counsel and Magistrate Strawbridge that he would be sending the same to the Plaintiff's attorney on or before the end of August, 2018.

13. On or about September 1, 2018, the Plaintiff, by and through her counsel, did

formally notify the Defendants' counsel that he had yet to receive said supplemental discovery, Monell discovery, or answers to her supplemental interrogatories and Requests for Production of Documents and that he required these items forthwith.

14. Defendants' counsel responded that he would provide said supplemental discovery.

15. Defendants counsel failed to provide any sort of discovery until he emailed a copious amount of internal Prison regulations and suicide check lists to Plaintiff's counsel on or about September 25, 2018.

16. On said date defense counsel acknowledged and agreed that he had still failed to comply with the aforementioned discovery requests and further stated that he would provide the completed discovery to Plaintiff "forthcoming".

17. As of the date of the filing of this motion Defendants' counsel has failed to provide any substantive discovery (including the aforementioned Monell materials).

18. Given the Defendants' consistent and persistent delay in providing said discovery in an expeditious time period Defendants' actions have severely hamstrung the Plaintiff's ability to adequately prepare her case for trial and to adequately investigate said case and to adequately prepare for the court mandated second settlement conference which is to take place before the Honorable Judge Strawbridge on November 8, 2018.

19. Moreover, given the Defendants' consistently dilatory conduct as it relates to providing the Plaintiff with said discovery in a timely manner Plaintiff is unable to provide her expert(s) with any substantive discoverable materials with which to form a legally cognizable opinion to support the Plaintiff's civil complaint.

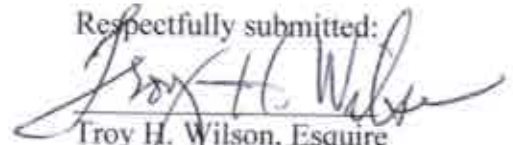
20. Given the defendants' aforementioned behavior the Plaintiff is severely hampered and prejudiced given the Defendants' consistently dilatory conduct.

21. At all times relevant hereto the Plaintiff has made numerous good faith efforts to resolve all aforementioned discovery requests all to her detriment.

22. Plaintiff is entitled to relief under Rule 37 of the Federal Rules of Civil Procedure.

WHEREFORE, the Plaintiff does respectfully request that this Honorable Court grant the Plaintiff's Motion for Sanctions to compel the full and complete discovery previously ordered to be provided to the Plaintiff several months ago, forthwith.

Respectfully submitted:



Troy H. Wilson, Esquire
Attorney for Plaintiff,
Gene Abran

Date: October 10, 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants.

No. 2:18-cv-01107

CERTIFICATE OF SERVICE

I, Troy H. Wilson, Esquire do assert that I did prepare, file and serve, via email, a true and correct copy of the attached Motion for Sanctions/Motion to Compel to the below party in reference to the above-captioned civil matter.

Mark Maguire, Esquire
Divisional Deputy City Solicitor
Civil Rights Unit
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102-1595


Troy H. Wilson, Esquire

DATE: October 10, 2018

Motions[2:18-cv-01107-MSG ABRAN v. CITY OF PHILADELPHIA et al](#)**STANDARD**

**United States District Court
Eastern District of Pennsylvania**

Notice of Electronic Filing

The following transaction was entered by WILSON, TROY on 7/19/2019 at 12:25 PM EDT and filed on 7/19/2019

Case Name: ABRAN v. CITY OF PHILADELPHIA et al

Case Number: [2:18-cv-01107-MSG](#)

Filer: RENA ABRAN

Document Number: [79](#)

Docket Text:

First MOTION to Compel *Depositions*, First MOTION for Extension of Time to Complete Discovery filed by RENA ABRAN. Memorandum of Law, Exhibit. (Attachments: # (1) Memorandum, # (2) Exhibit)(WILSON, TROY)

2:18-cv-01107-MSG Notice has been electronically mailed to:

CASSIDY L. NEAL cneal@mbo-pc.com, ccannon@mbo-pc.com, jbuettner@mbo-pc.com, sandeits@mbo-pc.com

LISA A. CAULEY lcauley@okllp.com, akalfas@okllp.com

MARK MAGUIRE mark.maguire@phila.gov, armando.brigandi@phila.gov

THOMAS J. GREGORY tgregory@okllp.com, abarton@okllp.com

TROY H. WILSON troyhwilsons@att.net, bookerbrandi.wilson@gmail.com

2:18-cv-01107-MSG Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=7/19/2019] [FileNumber=16351224-0] [428bedfccf9167b914d9d4a26cb0b0e7f05b6a09a89fee6030044eace43e0d91ace7e6a758f59465c34277b4e40e4768327da21f7f8466e28b670e8362674d1df]]

Document description:Memorandum

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=7/19/2019] [FileNumber=16351224-1] [87bc543d36f79baf18452541dfc8edc012d7b9c988429ed48022373fb0ec4943afe96b58d93b0a3c5785283c07435799484121e745b8877ebc7f88787ac6d538]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP deecfStamp_ID=1001600548 [Date=7/19/2019] [FileNumber=16351224-2] [7c651995737e5e603b4e76cba1a7ee26fee0cd77df6f414d70b2be144a3ba917ecf724b98d7c0763a68f42c19fbbaa27f9c3d440aaf07941ddc1b5ea0f90591a]]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants

No. 2:18-cv-01107

ORDER

AND NOW TO WIT upon this day of ,

2019, upon consideration of the Plaintiff's Motion to Compel Depositions and to Extend Discovery Deadline and the responses filed thereto, it is hereby ORDERED that the Plaintiff's Motion to Compel and to Extend the Discovery Deadline date is hereby GRANTED.

This court will extend the applicable discovery deadline date for this above-captioned matter for an additional 30 days. During such time period the parties are ordered to conduct depositions for the following witnesses: Warden Williams Lawton, Dr. Oluwabusi, Corporate Designee for MHM Services, Inc., and Corporate Designee for Corizon Health, Inc.

J.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants

No. 2:18-cv-01107

**PLAINTIFF'S MOTION TO EXTEND DISCOVERY DEADLINE AND
TO COMPEL FOUR (4) DEFENSE THE DEPOSITION OF DEFENDANTS**

The Plaintiff files a Motion to extend discovery for 30 additional days to conduct and complete four (4) defense depositions and in support thereof does allege the following:

1. The instant federal 1983 Civil Rights lawsuit stems from allegations of substandard care as well as a failure to protect the then jailed decedent Plaintiff, Gene Wilson.
2. It is alleged that Mr. Wilson, while a prisoner at the Philadelphia House of Corrections, informed numerous defendants that he wanted to harm himself or others and that despite these assertions the defendants ignored the same and placed Mr. Wilson into solitary confinement where he, ultimately, committed suicide a mere several hours later.
3. Pursuant to taking discovery in reference to this matter the Plaintiff learned that several defendants, including defendant William Lawton, then warden of the Philadelphia House of Corrections surreptitiously met shortly after Gene Wilson's

death, ostensibly, to discuss the circumstances surrounding Gene Wilson's death.

4. At all times relevant hereto said defendant Lawton was employed by the defendant City of Philadelphia as Warden of the City's House of Correction jail facility.
5. Moreover, Plaintiff learned, in discovery, that defendant Dr. Olumide Oluwabusi, while employed with MHM Services, Inc. was the doctor who specifically authorized the prison to place Mr. Gene Wilson into solitary confinement despite the knowledge that Mr. Wilson had previously expressed a desire to harm himself or others.
6. On or about February 21, 2019, the Honorable Judge Goldberg did provide an updated discovery deadline of June 11, 2019.
7. On or about May 16, 2019 Plaintiff did send out a formal Notice of Deposition for Warden William Lawton's deposition to take place on May 28, 2019.
8. On said May 28, 2019 date the defendant was not made available for said deposition.
9. On or about June 4, 2019 a deposition of a defendant correctional officer named Clyde Fearon was conducted at the City Law Department. A request was made by Plaintiff's counsel to conduct defendant Lawton's deposition at the same time, date and location as that of defendant Clyde Fearon, for judicial economy sake and since defendant Lawton was not made available for the aforementioned May 28, 2019 deposition date. Defense counsel failed to respond to this request.
10. On June 4, 2019 said defendant Lawton failed to appear at said June 4th deposition.

9. On or about June 5, 2019 the Plaintiff did notify counsel for the City and Lawton that he had failed to respond to Plaintiffs request(s) to take defendant Lawton's deposition. Plaintiff renewed his request to take said defendant's deposition.
10. On or about June 5th counsel for the defendant did respond with two suggested deposition dates to take Lawton's deposition.
11. After conferring with all counsel of record June 19, 2019 became the agreed upon date to conduct said defendant Warden Lawton's rescheduled deposition.
12. For that matter the parties also agreed to take the deposition of one Dr. Olumide Oluwabusi on the same date as well however, Cassidy Neal, Esquire, counsel for Dr. Oluwabusi was unavailable on that date.
13. Pursuant to the above the Plaintiff did formally request the deposition of the defendant Warden William Lawton for June 19, 2019 and all parties agreed to the same.
14. On July 19, 2019, counsel for the defendant Lawton emailed Plaintiff's counsel to that he has finally located defendant Lawton and that he is now prepared to schedule Warden Lawton's deposition sometime in August, 2019.
14. Additionally, several months ago, on or about April 13, 2019, the Plaintiff did request that she be allowed to take the deposition of the Corporate Designee of the Defendant, Corizon Health, Inc.
15. The attorney for Corizon Health, on that same date of April 13, 2019 did request that this Plaintiff provide Corizon with a detailed summary of the areas they wish to cover said designee.
16. On or about July 10, 2019 said Plaintiff did provide the same to Corizon's

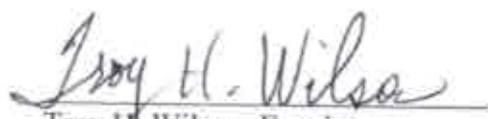
counsel.

17. All parties, including defendant Corizon Health, Inc., have no objection to the requested 30 day time extension for the discovery deadline. However, Corizon only objects to the request to compel the deposition of its Corporate Designee during said time period as they allege that said request was made after the applicable discovery deadline.
18. At all times relevant hereto during and after the expiration of the aforementioned discovery deadline the parties (excluding the new defendants Dr. Oluwabusi and MHM Services, Inc.) had, through their respective attorneys, engaged in various and sundry discussions in attempts to secure the depositions of several witnesses prior to the expiration of the aforementioned discovery date.
17. At all times relevant hereto the Plaintiff believes she did act diligently in attempting secure the depositions of the Corizon Health Corporate Designee, Warden Lawton and Dr. Oluwabusi prior to the expiration of the aforementioned discovery deadline.
18. Defendant, Oluwabusi and MHM Services, Inc. were only recently formally entered into this civil case per court order. (See attached order).
19. Therefore Plaintiff was unable to secure the deposition of the Corporate Designee of MHM Services since, as per Plaintiff's aforementioned recently granted Amended Complaint, Plaintiff was only recently made aware of the presence and/or relationship of MHM Services to the above-captioned matter at hand.
20. On or about June 18, 2019, this honorable court granted the Plaintiff's Second Amended Complaint thereby allowing two new parties to be joined to this above-

captioned matter.

21. As of the filing of this motion to briefly extend the discovery deadline the aforesaid two new defendants have not file a response to said Second Amended Complaint.
22. Additionally, for that matter, none of the defendants have filed their Answers to the Plaintiff's Second Amended Complaint.
23. And the defendants, Dr. Olumide Oluwabusi and MHM Services, Inc. have also yet to provide Plaintiff with their own discovery disclosures under Rule 26.
24. Plaintiff is hampered and prejudiced if the 30 day extension to conduct said depositions is not granted since she will be unable to secure an additional prison psychiatrist expert who can render an opinion concerning whether the standard of care has been breached in this particular case.
25. Said expert will be required to review the deposition notes of testimony prior to rendering an opinion on this issue.
26. On or about February 21, 2019, the Honorable Judge Goldberg did provide an updated discovery deadline of June 11, 2019.
27. At this time while a Dr. Olawabusi was a named party within the Plaintiff's complaint, unbeknownst to Plaintiff, Dr. Olawabusi's employer, MHM Services, Inc. was not a named defendant.
28. Therefore, a brief extension of the applicable discovery deadline is necessary under the circumstances to allow for the respective parties to complete their aforementioned depositions of the four (4) witnesses despite the best efforts to complete the same prior to the previously imposed discovery deadline.

Respectfully submitted:


Troy H. Wilson, Esquire

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants

No. 2:18-cv-01107

PLAINTIFF'S MEMORANDUM OF LAW

QUESTION:

Should this court grant the Plaintiff's motion to extend the discovery deadline an additional 30 days when, prior to the expiration of the applicable discovery deadline Plaintiff attempted to secure the depositions of at least three of the four witnesses it wished to depose and when a new defendant was recently added to the above civil rights matter and where neither harm nor prejudice would come to any party for extending said discovery deadline, especially when all parties agree to said extension, despite defendant Corizon's objection to making their corporate designee available for a deposition?

Answered in the affirmative.

LAW:

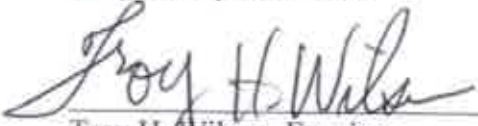
Under this court's internal rules and the applicable Federal Discovery Rules of Civil Procedure under Rule 29 this court may modify a discovery deadline if the parties agree. Moreover, under Federal Rule 16(b)(4) the court maintains the inherent power to modify a discovery schedule for "good cause" and with the court's consent. Fed. R.Civ.Pro. 16(b)(4).

ARGUMENT:

In this particular case while the defendant Corizon Health, Inc. objects to the request to compel the deposition of its own Corporate Designee it, like all other parties to this action, has no objection to the request to extend the discovery deadline by 30 to compel the depositions of the other parties. As mentioned above Plaintiff's counsel did, prior to the expiration of said discovery deadline, request that Corizon provide its corporate designee for a deposition. Corizon confirmed the same when, prior to the expiration of said discovery deadline, they requested that Plaintiff provide them with a summary of their Corporate Designee request. On or about July 10, 2019 Plaintiff complied with Corizon's request for additional detail. Defendant is neither harmed nor prejudiced if this court grants the time extension and also orders Corizon to make its Corporate Designee available for a deposition (along with the three other deponents). This honorable court has to the power to modify said discovery deadline. Especially if all of the other parties agree to the same and where neither harm nor prejudice will come to the lone, objecting defendant who disagrees with said deadline extension.

Therefore, Plaintiff respectfully requests that this court extend the applicable discovery deadline by 30 days and order all parties to conduct and complete the depositions of the four remaining witnesses within this time period.

Respectfully submitted:


Troy H. Wilson, Esquire

Request for tentative dep date(s) for Head Prison Warden and for Corp. Designee for Corizon

From: Troy Wilson (troyhwilsons@att.net)

To: mark.maguire@phila.gov; lcauley@okllp.com

Date: Tuesday, April 16, 2019, 04:33 PM EDT

Kindly provide some tentative dates where we can schedule these deps at your earliest convenience. Thanks in advance

Troy H. Wilson, Esquire 215 S. Broad Street, 2nd Floor Philadelphia, PA 19107 O(215) 985-4566 troyhwilsons@att.net
THIS ELECTRONIC TRANSMISSION, AND ANY ATTACHED DOCUMENT(S) AND/OR FILE(S), IS CONFIDENTIAL
AND/OR LEGALLY PRIVILEGED. IT IS INTENDED FOR THE SOLE USE OF THE INDIVIDUALS TO WHOM IT IS
ADDRESSED. ANY FURTHER DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU
RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY THE SENDER AND DESTROY THE MESSAGE (AND ANY
ATTACHED DOCUMENTS AND FILES) IMMEDIATELY. Troy H. Wilson, Esquire IS NOT LIABLE FOR ANY USE OR
MISUSE CONTRARY TO THESE DIRECTIONS. THANK YOU.

RE: Request for tentative dep date(s) for Head Prison Warden and for Corp. Designee for Corizon
From: Lisa Cauley (LCauley@okllp.com)
To: troyhwilsons@att.net; mark.maguire@phila.gov
Date: Tuesday, April 16, 2019, 04:34 PM EDT

I need the subject matter for the designee, Troy, so I can determine the correct person.

Lisa A. Cauley, Esquire

O'CONNOR KIMBALL LLP

Two Penn Center Plaza, Suite 1100

1500 John F. Kennedy Boulevard

Philadelphia, PA 19102

Telephone: (215) 564-0400

Cell: (610) 909-2486

Facsimile: (215) 564-1973

Email: lcauley@okllp.com

Website: www.oconnorkimball.com

From: Troy Wilson <troyhwilsons@att.net>

Sent: Tuesday, April 16, 2019 4:33 PM

To: Mark Maguire <mark.maguire@phila.gov>; Lisa Cauley <LCauley@okllp.com>

Subject: Request for tentative dep date(s) for Head Prison Warden and for Corp. Designee for Corizon

Kindly provide some tentative dates where we can schedule these deps at your earliest convenience. Thanks in advance

Troy H. Wilson, Esquire 215 S. Broad Street, 2nd Floor Philadelphia, PA 19107 O(215) 985-4566 troyhwilsons@att.net THIS ELECTRONIC TRANSMISSION, AND ANY ATTACHED DOCUMENT(S) AND/OR FILE(S), IS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED. IT IS INTENDED FOR THE SOLE USE OF THE INDIVIDUALS TO WHOM IT IS ADDRESSED. ANY FURTHER DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY THE SENDER AND DESTROY THE MESSAGE (AND ANY ATTACHED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

V.

CITY OF PHILADELPHIA, ET AL,

Defendants

No. 2:18-cv-01107

CERTIFICATE OF SERVICE

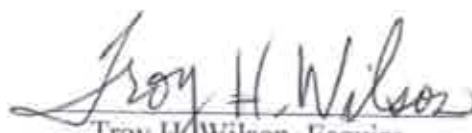
I, Troy H. Wilson, Esquire, attorney for the Plaintiff do assert and submit that I served a copy of the within Motion to Compel to the below parties by way via e-filing and email on the below listed date:

Mark Maguire, Esquire
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19107

Lisa Cauley, Esquire
Thomas Gregory, Esquire
O'Connor Kimball LLP
Two Penn Center Plaza, Suite 1100
1500 JFK Boulevard
Philadelphia, PA 19102

Cassidy Neal, Esquire
Matis Baum O'Connor, P.C.
912 Fort Duquesne Blvd
Pittsburgh, PA 15222

Date: July 19, 2019


Troy H. Wilson, Esquire
Attorney For Plaintiff

7/19/2019 AT&T Yahoo Mail - RE: Request for tentative dep date(s) for Head Prison Warden and for Corp, Designee for Corizon
DOCUMENTS AND FILES) IMMEDIATELY. Troy H. Wilson, Esquire IS NOT LIABLE FOR ANY USE OR MISUSE
CONTRARY TO THESE DIRECTIONS. THANK YOU.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

v.

CITY OF PHILADELPHIA, ET AL.,

Defendants.

CIVIL ACTION

No. 18-cv-1107

ORDER

AND NOW, this 18th day of June, 2019, upon consideration Plaintiff's Motion to Amend the Complaint (ECF No. 65), and the responses thereto (ECF Nos. 66, 68), it is hereby **ORDERED** that:

1. Plaintiff's Motion is **GRANTED** pursuant to Federal Rule of Civil Procedure 15(a)(2);
2. Plaintiff shall file her amending pleading **on or before July 1, 2019**; and
3. The telephone conferenced scheduled for Thursday, June 27, 2019 is **CANCELLED**.

BY THE COURT:

/s/ Mitchell S. Goldberg

MITCHELL S. GOLDBERG, J.

EXHIBIT “B”



TROY H. WILSON, ESQUIRE
Attorney at Law

215 S. Broad Street • 2nd Floor • Philadelphia • Pennsylvania | Phone: (215) 985-4566 | www.wilsonandwilsonesq.com

February 3, 2020

regular mail & via email: mark.maguire@phila.gov

Mark V. Maguire, Esquire
City of Philadelphia Law Department
1515 Arch Street
14th Floor
Philadelphia, PA 19102

RE: Rena Abran vs. City of Philadelphia, etal; Case#:2:18-cv-01107;

Dear Mr. Maguire:

Enclosed please find Plaintiff's Supplemental Request for Production to the City of Philadelphia, etal, based on the deposition of Warden Lawton in reference to the above-captioned matter.

If you have any additional questions or concerns please do not hesitate to contact me at your earliest convenience.

Very truly yours,


TROY H. WILSON, ESQUIRE

THW/bb
Enclosure
cc: Lisa A. Cauley, Esquire
Cassidy Neal, Esquire

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RENA ABRAN,

Plaintiff,

v.

CITY OF PHILADELPHIA, ET AL,

Defendants.

No. 2:18-cv-01107

**PLAINTIFF'S SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO DEFENDANT THE CITY OF PHILADELPHIA**

Pursuant to Federal Rule of Civil Procedure 34, Plaintiff propounds the following Supplemental Request for Production of Documents to be answered within the thirty days of service:

I. DEFINITIONS

1. "You" means Defendants and anyone acting on their behalf.
2. "Document" shall have the same definition as set forth in the Federal Rules of Civil Procedure.

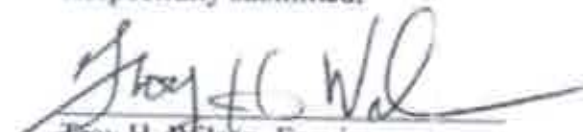
II. DOCUMENTS REQUESTED

Supplemental Request for Production of Documents based on Warden Lawton's January 14, 2020 deposition:

1. Any and all lieutenant and/or captain prison statements and/or investigation reports for any and all suicide deaths at the Philadelphia House of Correction for the last eight years, including, but not limited to, inmate Gene Wilson.
2. Copies of any and/or all tape recorded statements from meetings and/or "debriefings" held at Warden Lawton's offices for all prison deaths and/or suicide deaths from 2010 to 2018 at the House of Corrections.

3. Copies of any and all transcribed statements from meetings held at Warden Lawton's offices for all prison deaths and/or suicide deaths and/or prison sentient events from 2010 to 2018 at the House of Corrections.
4. Copies of any and all signed investigative statements, reports and the like signed by Warden Lawton for all prison suicide deaths during his tenure as Warden at the Philadelphia House of Corrections from 2010 to 2018.
5. Any and all prison suicide reports, correspondence, emails and the like pertaining to Gene Wilson and other prison suicide prisoners for the last eight years which either is, or, in the alternative, was in the possession of one Katrina Lewis.
6. Copies of any and all signed investigative statements, reports and the like signed by Warden Lawton for all prison suicide deaths during his tenure as Warden at the Philadelphia House of Corrections from 2010 to 2018 that were transferred or delivered to the Deputy Commissioner and/or Deputy Commissioner of Operations of the Philadelphia Prison System.
7. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to any and all deaths at the House of Corrections during this time period.
8. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to any and all prison suicide deaths at the House of Corrections during this time period.
9. Copies of any and all notes, notations, statements (written or otherwise), reports and the like between 2010 and 2018 for all weekly staff meetings related to the prison suicide death of Gene Wilson at the House of Corrections during this time period.
10. Copy of the Self Injury Prevention Program policy.
11. Provide a copy of the specific written rule, regulation or policy (along with policy number) for inmates transferred from ASD to HOC?
12. Copies of any and/or all of the prison social worker written reports during their tours of duty at the House of Corrections on March 26, 2016.

Respectfully submitted,



Troy H. Wilson, Esquire
Attorney for Plaintiff

EXHIBIT “C”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RENA ABRAN (Estate of Gene Wilson) :

Plaintiff, :

v. :

CITY OF PHILADELPHIA et al, :

Defendant. :

CIVIL ACTION

No. 18-1107

JURY TRIAL DEMANDED

**DEFENDANT CITY OF PHILADELPHIA'S RESPONSES
TO PLAINTIFF'S SUPPLEMENTARY REQUEST FOR
PRODUCTION OF DOCUMENTS**

1. The Institutional investigations for all suicides within HOC between the previously established appropriate time period of 2011-2016 shall be provided. I refer you to the previously provided summary of the suicides from this time period.
2. The City of Philadelphia is not in possession of any such recordings. However, the content of any such recordings is incorporated in the Institutional Investigations that shall be provided.
3. The City of Philadelphia is not in possession of any such transcripts. However, the content of any such recordings is incorporated in the Institutional Investigations that shall be provided.
4. See the Institutional Investigations that shall be provided.
5. Answering Defendant does not preserve email communications from the period requested.
6. See the Institutional Investigations that shall be provided.
7. The City of Philadelphia is not in possession of any such notes. However, the content of any such recordings is incorporated in the Institutional Investigations that shall be provided.
8. The City of Philadelphia is not in possession of any such transcripts. However, the content of any such recordings is incorporated in the Institutional Investigations that shall be provided.

9. The City of Philadelphia is not in possession of any such transcripts. However, the content of any such recordings is incorporated in the Institutional Investigations that shall be provided.
10. See previously provided policies as well as any attached policies.
11. Answering Defendant objects on the basis that this request is vague. Answering defendant refers plaintiff to all previously provided policies.
12. The City of Philadelphia will not produce social work notes related to other inmates. Gene Wilson's social work file was previously provided.

Date:

2/24/20



mvm6856

MARK V. MAGUIRE

Divisional Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102-5397

No.	PP	Last	First	R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
309	1			H/M	41	CFCF	6:51p	Aria/Frank	1/27/11	Natural	Meningitis	closed
310	2			W/M	58	PICC	6:36p	PICC A-unit	2/17/11		Hanging	closed
311	3			H/M	18	HOC	8:05p	HOC C-1	2/28/11		Hanging	closed
312	4			B/F	41	RCF-H-unit	1:30a	Aria/Frank	3/10/11	Natural	Cocaine	closed
313	5			H/M	31	HOC	8pm	Temple	4/6/11	Natural	cryptococcal meningitis	closed
314	6			B/M	28	ASDCU	7p	UOP	4/8/11	Natural	Ruptured Berry Aneurysm	closed
315	7			W/M	37	CFCF	6p	Nazareth	5/21/11	Natural	Hypertensive Heart Disease	closed
316	8			B/M	32	DC	3p	D/C-B block	6/11/11		Hanging	open
317	9			B/M		CFCF	9:20p	C-2-2	6/21/11	Homicide	Stabbed	open
318	10			B/M	32	CFCF	1:55p	B-1-3	8/13/11		Hanging	open
319	11			B/F	46	RCF-D	10:08a	D-unit	8/21/11	Natural	Hypertensive Heart Disease	open
320	12			W/M	45	PICC-H	8:30a	H-unit	10/26/11	Natural	Massive Gastro-Intestinal Hemorrhage	open
321	13			B/M	60	CFCF		Aria/Frank	11/12/11	Natural	Intracerebral Hemorrhage	open

NOTE: 1055163 Moscos

Kevin

B/M

28

Street

2/21/11

Homicide

Killed while on work release

open

Multiple Gunshot Wounds (2) to Head and Arm

No.	PP	Last	First	R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
322	1			B/F	48	RCF	9:43a	Aria/Torresdale	1/5/12	Natural	Hypertensive Heart Disease	closed
323	2			W/M	34	HOC	10:04p	Aria/Torresdale	2/9/12	Natural	Nequeant Necrophilia of Testis	closed
324	3			W/M	35	CFCF	3:43p	D1Pod2	3/11/12		Hanging	closed
325	4			W/M	27	PICC	9:09p	Cunit #5	3/14/12	Natural	Probable Seizure and Cardiac Arrest	closed
326	5			B/M	48	HOC	8:15a	F2 Block	3/16/12	Natural	Non-Traumatic Seizure Disorder	closed
327	6			B/M	50	DC	4:38a	Aria/Torresdale	5/14/12	Natural	Cardiac Arrhythmia, Undetermined	closed
328	7			B/M	51	PICC	7:55a	F2 Unit	6/13/12	Natural	Cardiac Arrhythmia/Hypertensive Heart Disease	closed
329	8			W/M	35	ASDCU	unknown	Street	6/19/12	Accident	Drug Intoxication	closed
331	9			H/M	62	CFCF	8:12p	D1Pod2	6/27/12	Natural	Hypertensive and Atherosclerotic Heart Disease	closed
332	10			W/M	24	PICC	6:04p	Aria/Torresdale	7/18/12		Hanging	closed
333	11			W/M	24	DC	8:30p	B-Block	7/18/12		Hanging	closed
334	12			H/M	26	DC	2:05p	B-Block	7/20/12		Hanging	closed
335	13			B/M	54	DC	3:15a	Aria/Torresdale	10/8/12	Natural	Hypertensive Intracerebral Hemorrhage	closed
336	14			B/M	44	CFCF	1:38a	Aria/F	11/22/12	Natural	Sepsis/Gangrenous Cholecystitis	closed
337	15			B/F	54	RCF	8:19p	Nazareth	12/29/12	Natural	Hypertensive and Atherosclerotic Heart Disease	closed

No.	PP	Last	First
338	1		
339	2		
340	3		
341	4		
342	5		
343	6		
344	7		
345	8		
346	9		
347	10		
348	11		
349	12		
350	13		
351	14		
352	15		

R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
BM	65	DC	4:10a	Nazareth	1/19/13	Natural	Pneumonia	closed
BM	50	DC	6:10a	U of Penn	1/31/13	Natural	Perforated Transverse/Aortic Dissection	closed
W/F	43	DC	1:10a	PHSW/207-16	2/3/13	Accident	Complication of Tracheal Stenosis	closed
BM	65	DC	6:58a	PHSW/220-13	2/9/13	Natural	Complicated/Hypertensive Heart Disease	closed
BM	57	DC	5:40p	Arla/Frankfrd	2/26/13	Natural	Sequence of Chondro/hypertensive and	closed
BM	29	DC	4:50a	PHSW/220-24	5/2/1/13	Natural	Suicide	closed
HM	36	CF/CF	7:43p	Arla/Torresdale	8/17/13	Natural	Cerebral Ischemic Infarct/Vascular Disease	closed
HM	84	CF/CF	2:40a	Einstein	8/24/13	Natural	Compulsive Heart Failure	closed
BM	20	PICC	8:43p	K-Unit 20	9/4/13	Natural	Hanging	closed
B/F	53	RCF	11:20a	Nazareth	9/11/13	Natural	Chondro/Hepatitis C/Hypertensive Heart Disease	closed
BM	72	CF/CF	7:44a	Nazareth	9/16/13	Natural	Hypertensive/Atherosclerotic Cardiovascular	closed
HM	52	CF/CF	5:53p	Hananiah	10/3/13	Natural	Sepsis/Acute Liver Failure	closed
HM	80	CF/CF	4:18p	Arla/Frankfrd	10/23/13	Natural	Acute Liver Failure/Atherosclerotic Heart Disease	closed
WM	47	PICC	4:13p	Arla/Torresdale	12/9/13	Natural	Hypoxic Ischemic Encephalopathy	closed
BM	44	DC	5:32p	Arla/Frankfrd	12/30/13	Natural	Sepsis/Ruptured Appendix	closed

No.	PP	Last	First
353	1		
354	2		
355	3		
356	4		
357	5		
358	6		
359	7		
360	8		
361	9		
362	10		
363	11		
364	12		
365	13		
366	14		

R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
WM	46	ASOCU	11:18p	Arla/Torresdale	1/16/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
HM	46	CF/CF	10:55a	Medical Triage	2/10/14	Natural	Perforated/Perforated Duodenal Ulcer	closed
BM	37	DC	8:51p	Arla/Torresdale	3/3/14	Natural	Hypertensive Heart Disease	closed
W/F	37	RCF	5:53a	G-Unit Mor-2	3/4/14	Natural	Epidural Spinal Abscess	closed
BM	37	PICC	8:41a	G-1	3/31/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
BM	33	HOC	12:54a	Nazareth	4/28/14	Natural	Bronchial Asthma	closed
BM	47	DC	4:58a	C-Dayroom	5/19/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
WM	30	CF/CF	1:29p	Nazareth	6/6/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
BM	49	PHSW	10:55p	Arla/Torresdale	8/15/14	Natural	Tuberculosis	closed
WM	76	PHSW	11:06p	Nazareth	9/9/14	Natural	Altimiscemic Heart Disease	closed
BM	51	CF/CF	6:49a	Nazareth	9/22/14	Natural	Hypertensive/Coronary Vascular Disease	closed
BM	57	HOC	6:04a	G1 cell 1142	10/16/14	Natural	Atherosclerotic/Hypertensive Heart Disease	closed
WM	32	CF/CF	9:38a	B1 Por3 cell 3	10/20/14	Natural	Diabetic Ketoacidosis	closed
BM	35	PHSW	6:58a	220 cell 22	11/14/14	Natural	Atherosclerotic/Hypertensive Heart Disease	closed

No.	PP	Last	First	R/S	Age	Facility	Time	Place of DTH	Admit	Date Occ.	Manner	Cause of Death	Status
367	1			WM	26	PICC	1:12a	K-Unit cell 28	10/25/14	1/10/15	Slitride	Hanging	closed
368	2			BM	55	CFCF	11:45p	B1Pod3 cell 15	02/14/15	2/15/15	Natural	Chronic Cocaine Abuse	closed
369	3			HMM	42	HOC	10:00p	Jefferson	11/12/14	4/1/15	Natural	Alcohol-related Cardiovascular Disease	closed
370	4			WM	47	ROF	10:25a	F-Unit	04/04/15	4/1/15	Natural	Hypertensive Heart Disease	closed
371	5			HMM	65	CFCF	7:42p	Ana/Frankfd	04/11/14	4/16/15	Natural	Complications of Chronic Alcoholism	closed
372	6			WM	32	CFCF	7:02p	B1Pod3/20	04/22/15	4/23/15	Natural	Post-Traumatic Stress Disorder	closed
373	7			BM	52	PICC	7:25a	A-Unit cell 15	08/11/14	4/28/15	Undetermined	Blunt Impact Trauma to the Head/Neck	closed
374	8			BM	50	ASDCU	1:10p	Nazareth	05/28/14	5/6/15	Natural	Pneumonia/Bacterial Sepsis (A.L.D.S)	closed
375	9			HMM	53	CFCF	4:51a	Nazareth	11/01/13	6/8/15	Natural	Hypertensive/Carotid Vascular Disease	closed
376	10			HMM	38	CFCF	4:53a	Nazareth	08/22/15	6/25/15	Accident	Hemoperitoneum, Splenic Lacerations	closed
377	11			BM	58	CFCF	11:31a	Hannemann	02/18/13	6/30/15	Accident	Blunt Impact Trauma	closed
378	12			BM	43	ROF	7:30p	Ana/Torres	01/22/15	7/4/15	Natural	Blunt Trauma of the Head	closed
379	13			HMM	58	CFCF	5:10a	B1Pod1 cell 13	03/13/15	7/19/15	Natural	Malignant Neoplasm of Valve	closed
380	14			HMM	40	CFCF	9:15p	C2Pod1 cell 9	06/04/15	7/24/15	Natural	Complications of Chronic Diverticulitis	closed
381	15			BM	26	CFCF	1:38p	B1Pod2 cell 31	07/29/15	7/31/15	Slitride	Cardiovascular Disease	closed
382	16			BM	48	ROF	2:30p	Ana/Torres	04/23/15	8/10/15	Natural	Hanging	closed
383	17			HMM	54	CFCF	8:11a	Ana/Torres	07/17/15	8/11/15	Natural	Bacterial Endocarditis	closed
384	18			BM	57	CEC	2:44a	Temple Hosp	08/05/15	11/29/15	Natural	Intra-cerebral Hemorrhage	closed
385	19			WM	51	CFCF	7:50a	C2Pod4 cell 2	12/11/15	12/15/15	Natural	Hypertensive/Carotid Vascular Disease	closed
												pending further investigation	open

No.	PP	Last	First
385			
387			
388			
389			
390			
391			
392			
393			
394			

R/S	Age	Facility	Time	Place of DTH	Admit	Date Occ.	Manner	Cause of Death	Status
B/M	46	HOC	6:52a	D1-554 cell	03/21/16	3/26/16		Hanging	Closed
H/M	39	CFCF	12:39p	A1-3 cell 14	01/05/16	4/14/16		Hanging	Closed
B/M	25	PICC	10:52	A1-cell 13	05/09/16	5/31/16		Hanging	Closed
W/M	42	ASDCU	11:40	Apha/Tones	06/03/16	6/6/16		Hanging	Closed
B/M	46	CFCF	2:30p	B-1-4-07	06/28/16	7/2/16		Hanging	Closed
H/M	53	CFCF	9:30a	Jefferson	01/20/16	8/25/16		Hanging	Closed
H/M	36	CFCF	8:18A	B1-Pod4 #23	09/10/16	9/12/16	Accidental	Drug Intoxication	Closed
H/M	31	DC	5:11pm	Nezareth Hosp.	09/16/16	11/19/16		Hanging	Closed
W/M	37	CFCF	5:21pm	B1-Pod4 #22	12/01/16	12/2/16		Hanging	Closed
W/M	29	HOC	10:00pm	F1 932 cell	12/14/16	12/18/16		Hanging	Closed

EXHIBIT “D”

No.	PP	Last	First	R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
309	1			H/M	41	CFCF	6:51p	Arla/Frank	1/27/11	Natural	Meningitis	closed
310	2			W/M	58	PICC	6:38p	PICC A-unit	2/17/11		Hanging	closed
311	3			H/M	19	HOC	8:05p	HOC C-1	2/28/11		Hanging	closed
312	4			B/F	41	RCF-H-unit	1:30a	Arla/Frank	3/10/11	Natural	Carcinoma	closed
313	5			H/M	31	HOC	8pm	Temple	4/6/11	Natural	cryptococcal meningitis	closed
314	6			B/M	26	ASDCU	7p	UOP	4/6/11	Natural	Ruptured Berry Aneurysm	closed
315	7			W/M	37	CFCF	8p	Nazareth	5/21/11	Natural	Hypertensive Heart Disease	closed
316	8			B/M	32	DOC	3p	D/C-B block	6/11/11		Hanging	open
317	9			B/M		CFCF	9:20p	C-2-2	8/21/11	Homicide	Shot	open
318	10			B/M	32	CFCF	1:05p	B-1-3	8/13/11		Hanging	open
319	11			B/F	46	RCF-D	10:08a	D-unit	8/21/11	Natural	Hypertensive Heart Disease	open
320	12			W/M	45	PICC-H	8:30a	H-unit	10/26/11	Natural	Massive Gastro-intestinal Hemorrhage	open
321	13			B/M	60	CFCF		Arla/Frank	11/12/11	Natural	Intercerebral Hemorrhage	open

NOTE: 1055163 Moses

Kevin

B/M

26

Street

2/2/11

Homicide

Killed while on work release

open

Multiple Gunshot Wounds (2) to Head and Arm

No.	PP	Last	First	R/S	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
322	1			B/F	48	RCF	9:43a	Arla/Torresdale	1/5/12	Natural	Hypertensive Heart Disease	closed
323	2			W/M	34	HOC	10:04p	Arla/Torresdale	2/9/12	Natural	Malignant Neoplasm of Testis	closed
324	3			W/M	33	CFCF	3:43p	D1Pod2	3/11/12		Hanging	closed
325	4			W/M	27	PICC	9:09p	Cunit #5	3/14/12	Natural	Probable Seizure and Cardiac Arrmt	closed
326	5			B/M	48	HOC	9:15a	F2 Block	3/16/12	Natural	Non-Traumatic Seizure Disorder	closed
327	6			B/M	50	DC	4:38a	Arla/Torresdale	5/14/12	Natural	Cardiac Arrhythmia, Undetermined	closed
328	7			B/M	51	PICC	7:55a	F2 Unit	6/13/12	Natural	Cardiac Arrhythmia/Hypertensive Heart Disease	closed
329	8			W/M	35	ASDCU	unknown	Street	6/19/12	Accident	Drug Intoxication	closed
331	9			H/M	62	CFCF	8:12p	D1Pod2	6/27/12	Natural	Hypertensive and Atherosclerotic Heart Disease	closed
332	10			W/M	24	PICC	6:04p	Arla/Torresdale	7/18/12		Hanging	closed
333	11			W/M	24	DC	8:30p	B-Block	7/18/12		Hanging	closed
334	12			H/M	25	DC	2:05p	B-Block	7/20/12		Hanging	closed
335	13			B/M	54	DC	3:15a	Arla/Torresdale	10/8/12	Natural	Hypertensive Intracerebral Hemorrhage	closed
336	14			B/M	44	CFCF	1:38a	Arla/F	11/22/12	Natural	Septic/Sanguinous Cholecystitis	closed
337	15			B/F	54	RCF	8:19p	Nazareth	12/29/12	Natural	Hypertensive and Atherosclerotic Heart Disease	closed

No.	PP	Last	First
338	1		
339	2		
340	3		
341	4		
342	5		
343	6		
344	7		
345	8		
346	9		
347	10		
348	11		
349	12		
350	13		
351	14		
352	15		

RIS	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
BM	65	DC	4:10a	Nazareth	1/19/13	Natural	Pneumonia	closed
BM	50	DC	6:10a	U of Penn	1/31/13	Natural	Pericardial Tamponade/Aortic Dissection	closed
WM	43	DC	1:10a	PHSW/207-16	2/3/13	Accident	Complication of Tracheal Stenosis	closed
BM	65	DC	8:58a	PHSW/220-13	2/9/13	Natural	Congestive/Heart Failure	closed
WM	57	DC	8:40p	AtiaFrankrd	2/26/13	Natural	Sequelae of Cholesterylpermeable and	closed
BM	29	DC	4:50a	PHSW/220-24	5/21/13	Natural	Subocclusion	closed
HM	38	CFCF	7:43p	AtiaTorresdale	8/17/13	Natural	Cerebral Ischemic Infarct/Vascular Disease	closed
HM	84	CFCF	2:49a	Einstein	8/24/13	Natural	Cognitive Heart Failure	closed
BM	20	PICC	8:43p	K-Unit 20	9/4/13	Natural	Hanging	closed
BM	53	RCF	11:20a	Nazareth	9/11/13	Natural	Cholesterylpermeable C/Hypertensive Heart Disease	closed
HM	52	CFCF	5:53p	Hamman	10/3/13	Natural	Septicemia/Atherosclerotic Cardiovascular	closed
HM	80	CFCF	4:18p	AtiaFrankrd	10/23/13	Natural	Acute Liver Failure/Atherosclerotic Heart Disease	closed
WM	47	PICC	4:13p	AtiaTorresdale	12/9/13	Natural	Hypoxic Ischemic Encephalopathy	closed
BM	44	DC	8:32p	AtiaFrankrd	12/30/13	Natural	Septic/Ruptured Appendix	closed

No.	PP	Last	First
353	1		
354	2		
355	3		
356	4		
357	5		
358	6		
359	7		
360	8		
361	9		
362	10		
363	11		
364	12		
365	13		
366	14		

RIS	Age	Facility	Time	Place of DTH	Date Occ.	Manner	Cause of Death	Status
WM	46	ASDCU	11:16p	AtiaTorresdale	1/18/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
HM	46	CFCF	10:55a	Medical Triage	2/10/14	Natural	Peritonitis/Perforated Duodenal Ulcer	closed
BM	37	DC	8:51p	AtiaTorresdale	3/3/14	Natural	Hypertensive Heart Disease	closed
WM	37	RCF	5:53a	G-Unit Mor-2	3/4/14	Natural	Epidual Spinal Abscess	closed
BM	37	PICC	8:41a	G-1	3/31/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
BM	33	HOC	12:54a	Nazareth	4/26/14	Natural	Bronchial Asthma	closed
BM	47	DC	4:50a	C-Dayroom	5/19/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
WM	30	CFCF	1:29p	Nazareth	6/6/14	Natural	Hypertensive/Atherosclerotic Heart Disease	closed
BM	48	PHSW	10:50p	AtiaTorresdale	8/15/14	Natural	Tuberculosis	closed
WM	78	PHSW	11:00p	Nazareth	9/9/14	Natural	Atherosclerotic Heart Disease	closed
BM	51	CFCF	6:49a	Nazareth	9/22/14	Natural	Hypertensive/Arterio Vascular Disease	closed
BM	57	HOC	6:04a	G1 cell 1142	10/16/14	Natural	Atherosclerotic/Hypertensive Heart Disease	closed
WM	32	CFCF	9:39a	B1Pod3 cell 3	10/20/14	Natural	Diabetic Ketoacidosis	closed
BM	35	PHSW	8:59a	220 cell 22	11/14/14	Natural	Atherosclerotic/Hypertensive Heart Disease	closed

No.	PP	Last	First
367	1		
368	2		
369	3		
370	4		
371	5		
372	6		
373	7		
374	8		
375	9		
376	10		
377	11		
378	12		
379	13		
380	14		
381	15		
382	16		
383	17		
384	18		
385	19		

RIS	Age	Facility	Time	Place of DTH	Admit	Date Occ.	Manner	Cause of Death	Status
WM	26	PMCC	1:12a	K-Unit cell 28	10/25/14	1/10/15	Natural	Hanging	closed
WM	55	CFCF	1:46p	B1Pod3 cell 15	02/14/15	2/15/15	Natural	Chronic Cocaine Abuse	closed
WM	42	HCC	10:00p	Jefferson	11/12/14	6/1/15	Natural	Altersocipic Cardiovascular Disease	closed
WM	47	RCF	10:25a	F-Unit	04/04/15	4/11/15	Natural	Hypertensive Heart Disease	closed
WM	65	CFCF	7:40p	AriaFrankfrd	04/11/14	4/16/15	Natural	Complications of Chronic Alcoholism	closed
WM	32	CFCF	7:00p	B1Pod3/20	04/22/15	4/23/15	Undetermined	Post-Traumatic Seizure Disorder	closed
WM	52	PMCC	7:26a	A-Unit cell 15	08/11/14	4/28/15	Natural	Blunt Impact Trauma to the Head/Neck	closed
WM	50	ASDCU	1:10p	Nazareth	05/28/14	5/6/15	Natural	Pneumonia/Bacterial Sepsis (A.L.D.S)	closed
WM	53	CFCF	4:51a	Nazareth	11/01/13	6/8/15	Natural	Hypertensive/Carotid Vascular Disease	closed
WM	36	CFCF	4:53a	Nazareth	06/22/15	6/25/15	Accident	Hemorrhage, Splenic Lacerations and Blunt Impact Trauma	closed
WM	58	CFCF	11:31a	Hamamatin	02/16/13	6/30/15	Accident	Blunt Trauma of the Head	closed
WM	43	RCF	7:30p	Aria/Torres	01/22/15	7/4/15	Natural	Malignant Neoplasm of Vagus	closed
WM	58	CFCF	5:10a	B1Pod1 cell 13	03/13/15	7/19/15	Natural	Complications of Colonic Diverticulitis	closed
WM	40	CFCF	9:15p	C2Pod1 cell 9	08/04/15	7/24/15	Natural	Hypertensive Atherosclerotic Vascular & Cardiovascular Disease	closed
WM	26	CFCF	1:38p	B1Pod2 cell 31	07/29/15	7/31/15	Natural	Hanging	closed
WM	48	RCF	2:30p	Aria/Torres	04/23/15	8/10/15	Natural	Bacterial Endocarditis	closed
WM	54	CFCF	8:11a	Aria/Torres	07/17/15	8/11/15	Natural	Intracranial Hemorrhage	closed
WM	57	CEC	2:44a	Temple Hosp	08/05/15	11/29/15	Natural	Hypertensive/Carotid Vascular Disease	closed
WM	51	CFCF	7:50a	C2Pod4 cell2	12/11/15	12/15/15	Natural	pooling further investigation	open

No.	PP	Last	First
386			
387			
388			
389			
390			
391			
392			
393			
394			

R/S	Age	Facility	Time	Place of DTH	Admit	Date Occ.	Manner	Cause of Death	Status
BM	46	HOC	8:52a	D1-554 cell	03/21/16	3/26/16		Hanging	Closed
H/M	39	CFCF	12:38p	A1-3 cell 14	01/05/16	4/14/16		Hanging	Closed
BM	25	PCC	10:52	A1-cell 13	06/09/16	5/31/16		Hanging	Closed
W/M	42	ASDCU	11:40	Aria/Torres	06/03/16	6/6/16		Hanging	Closed
BM	46	CFCF	2:30p	B-1-4-07	06/28/16	7/2/16		Hanging	Closed
H/M	53	CFCF	9:30a	Jefferson	01/20/16	8/25/16		Hanging	Closed
H/M	36	CFCF	8:18A	B1-Pod4 #23	09/10/16	9/12/16		Hanging	Closed
H/M	31	DC	5:11pm	Nazareth Hosp.	09/16/16	11/19/16		Hanging	Closed
W/M	37	CFCF	6:21pm	B1-Pod4 #22	12/01/16	12/2/16		Hanging	Closed
W/M	29	HOC	10:00pm	F1 932 cell	12/14/16	12/18/16		Hanging	Closed